



Waymaker LLP
515 S. Flower Street, Suite 3500
Los Angeles, California 90071
T 424.652.7800

July 28, 2025

Brian E. Klein
Direct (424) 652-7814
bklein@waymakerlaw.com

Via ECF

Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Storm, 23 Cr. 430 (KPF)

Dear Judge Failla:

On behalf of our client, defendant Roman Storm, we write to respectfully request that the Court include in its jury charge the following Theory of the Defense instruction:

Mr. Storm has pled not guilty to all three charges. Mr. Storm contends that he did not agree with anyone to violate the law. Instead, Mr. Storm contends that he agreed with the Peppersec co-founders to develop privacy software for lawful purposes, and that he never willfully engaged in a conspiracy with anyone with the goal of furthering money laundering, operating an unlicensed money transmitting business, or evading international sanctions.

The defense will be ready to discuss this instruction with the Court at the charge conference.

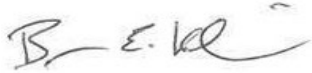
///

///

///

Hon. Katherine Polk Failla
July 28, 2025
Page 2 of 2

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "B. E. Klein", with a stylized flourish at the end.

Brian E. Klein
Keri Curtis Axel
Becky S. James
Kevin M. Casey
Viviana Andazola Marquez
Waymaker LLP

-and-

David E. Patton
Christopher Morel
Hecker Fink LLP

Attorneys for Roman Storm